

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

v.

SCHAHIN HOLDING S.A., SCHAHIN
ENGENHARIA S.A., SEA BISCUIT
INTERNATIONAL INC., BLACK GOLD
DRILLING LLC, BAERFIELD DRILLING LLC
and SORATU DRILLING LLC,

Respondents.
-----x

13 Civ. 0052 (JSR)

NOTICE OF RESPONDENTS' MOTION TO STAY ENFORCEMENT

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the declarations of Paul S. Hessler, Fernando Schahin, and José Isaias Hoffmann, Respondents Baerfield Drilling LLC, Soratu Drilling LLC, Black Gold Drilling LLC, and Schahin Engenharia S.A. (collectively, "Respondents") move this Court, before the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl Street, Room 14B, New York, New York, on September 9, 2013, at 4:30 p.m., for an order pursuant to N.Y. C.P.L.R. § 5240, granting the Respondents' Motion to Stay Enforcement, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York
August 27, 2013

Respectfully submitted,

Linklaters LLP

By: 

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and Schahin Engenharia S.A.*